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February 22, 2002

William F. Caton  
Acting Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Attn: Patrick Forster, Senior Engineer, Policy Division, Wireless Telecommunications Bureau

Re: CC Docket No. 94-102  
Qwest Wireless, LLC and TW Wireless, LLC  
Update to Fourth Quarter 2001 Report on Digital/TTY Compatibility

Dear Mr. Caton:

Pursuant to Section 20.18(c) and the *Fourth Report and Order* in the above-referenced proceeding,<sup>1</sup> Qwest Wireless, LLC, on its own behalf and that of TW Wireless, LLC (collectively "Qwest"), hereby submits the attached update to its Fourth Quarter 2001 Report on TTY-digital deployment to apprise the Federal Communications Commission ("Commission") of possible implementation delays affecting a small percentage of Qwest's customers.

Qwest has worked diligently with its vendors to acquire, test and deploy TTY-digital capabilities in its network and regularly issues requests for information ("RFIs") from its various vendors to ensure that their products will facilitate Qwest's compliance with various Commission regulatory mandates. In most of its markets, covering approximately 81 percent of all calls over Qwest's network, the company utilizes Lucent network infrastructure equipment. Testing of Lucent's digital TTY-compliant products is scheduled to occur April 3-19, 2002. In all markets served via Lucent equipment, Qwest anticipates compliance with the June 30, 2002 deadline of Section 20.18(c).

In the remaining markets, Qwest utilizes an "open wireless architecture" – the "Open A" – based on the A interface of the TIA/EIA-41 standard network model. This, in turn, allows Qwest to maximize its position as purchaser from a variety of manufacturers and vendors, thereby competing more effectively in the wireless marketplace. In these markets, Qwest utilizes Nortel switching equipment and Ericsson base station equipment. Qwest believes that it is the only carrier in the country with this particular network configuration.

In its January 15, 2002 Report, Qwest notified the Commission that it was still awaiting the necessary software for the Ericsson base stations and base station controllers in its Open A

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<sup>1</sup> 47 C.F.R. § 20.18(c); *In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Fourth Report and Order*, 15 FCC Rcd. 25216, 25220-222 ¶¶ 12-18 (2000).

markets, that Ericsson had previously informed Qwest that the necessary software should be generally available in February 2002, and that it had not learned of any change in that timeline. This information was based on correspondence to Qwest dated August 27, 2001 in which Ericsson represented that the necessary equipment would be available for first office application (“FOA”) by January 15, 2002, and general availability (“GA”) by February 15, 2002. Ericsson represented at the time that this was not a firm commitment, but in its own report to the Commission dated December 10, 2001 and submitted January 14, 2002 (via the TTY Forum), Ericsson affirmed that for CDMA network infrastructure “Cricket [*i.e.* Leap Wireless] and Qwest [the sole carrier customers for this particular product] plan to take delivery of acceptance level code upgrades to start field-testing in the first quarter of 2002.” Ericsson also stated “Development testing is expected to be completed by January 2002. System verification test release software is scheduled for release by the end of January 2002. System Acceptance rollout is scheduled for February 2002.”<sup>2</sup> Qwest’s January 15, 2002 Report is therefore consistent with the information submitted by Ericsson, but Qwest nonetheless cautioned that it is dependent on the commercial availability of digital TTY-capable products from its vendors.

Prior to the January 15, 2002 Report, via letter dated January 7, 2002, Qwest requested updated information from Ericsson regarding the availability of digital TTY-compatible products. Subsequently, via letter dated January 30, 2002, Ericsson responded – albeit this time as a “firm commitment” – that the GA date for its product has been postponed until *May 28, 2002*.<sup>3</sup> Qwest separately learned on February 7, 2002 in phone discussions with Ericsson personnel that the FOA date for Ericsson’s digital TTY-base station products was postponed until some time in March 2002, and that Leap Wireless, not Qwest, would receive Ericsson’s product for FOA purposes.

Based on prior experience, Qwest anticipates that a reliable digital TTY-compatible product will not be available for an additional 2-3 months beyond the June 30, 2002 deadline. As noted above, Leap Wireless, Ericsson’s other customer, will obtain the FOA version of the product. The FOA version will, in turn, undergo further testing and modification to ensure compatibility with *Leap*’s network, which (as Qwest understands) utilizes Ericsson equipment and software essentially on an “end-to-end” basis. Because Qwest will not obtain the FOA version of Ericsson’s product, further modifications (via a “patch”) may very well be necessary to ensure that the product is compatible with other non-Ericsson components of the Open A system, such as the Nortel switch, and that reliable TTY information in turn is transmitted to Public Safety Answering Points (“PSAPs”) and other customers via Qwest’s digital wireless network.

Qwest is continuing its discussions with Ericsson regarding delivery, testing, and roll-out schedules. However, based on the information currently available it appears likely that Qwest may need to seek a waiver of the June 30, 2002 deadline shortly. Any requested waiver would be limited in scope to the small percentage of Qwest’s customers served via the Open-A system.

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<sup>2</sup> TTY Forum’s Aggregate Report of Carriers for 4th Quarter 2001, filed January 14, 2002 in CC Docket No. 94-102, at App. L.

<sup>3</sup> Qwest had requested that the information be provided not later than January 15, 2002.

Mr. William F. Caton  
Federal Communications Commission  
February 22, 2002  
Page 3

In the interim, Qwest submits the instant Supplemental Report to keep the Commission updated on this new development.

Qwest will apprise the Commission of additional relevant information once it becomes available and will discuss with Commission staff any necessary relief. Please contact the undersigned if you have questions or need additional information.

Respectfully submitted,

QWEST WIRELESS, LLC

/s/

Floy H. Jeffares  
Manager

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